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James S. Richter

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

_____	x
	:
MARK BERRADA,	: Honorable Susan D. Wigenton, U.S.D.J.
	:
Plaintiff,	: Civil Action No. 16 CV 574 (SDW) (LDW)
	:
v.	:
	:
GADI COHEN and PNY TECHNOLOGIES,	: DEFENDANTS' NOTICE OF MOTION
INC., a Delaware corporation,	: FOR SUMMARY JUDGMENT
	:
Defendants.	: Oral Argument Requested
	:
	: Return date: April 16, 2018
	:
_____	x

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on April 16, 2018, the undersigned attorneys for Defendants Gadi Cohen and PNY Technologies, Inc. ("Defendants") will move before the Honorable Susan D. Wigenton, U.S.D.J., at the United States District Court, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order granting Defendants' Motion for Summary Judgment.

PLEASE TAKE FURTHER NOTICE that Defendants rely upon the Memorandum of Law, Local Civil Rule 56.1 Statement of Material Facts Not in Dispute, Declaration of James S. Richter, all exhibits attached thereto, and all supporting papers which are submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument.

Dated: March 20, 2018

s/ James S. Richter
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CERTIFICATION OF SERVICE

I hereby certify that on March 20, 2018, copies of the foregoing Notice of Motion and supporting documents were electronically filed and served by notice of electronic filing upon all counsel of record.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

s/ James S. Richter
James S. Richter
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Dated: March 20, 2018